

United States District Court

DISTRICT OF NEW HAMPSHIRE

United States of America

v.

Ian Freeman

CASE NUMBER: 1:21-cr-000041

MOTION TO MODIFY RELEASE CONDITIONS

NOW COMES the defendant, Ian Freeman, by and through counsel, Mark L. Sisti, and respectfully requests that this Honorable Court Modify his Conditions of Release.

As grounds for and in support of this request, the Defendant states as follows:

1. After his conviction in Federal District Court, Ian Freeman was released with several conditions.
2. He has been compliant while under supervision by Karin Hess, U.S. Probation. He has been supervised for four (4) months without incident.
3. At this time, he would request that the “home confinement” aspect of his release be eliminated. He is no danger to himself, or the community and any monitoring can easily be done by Ian calling into Probation at given times. Additionally, he can be heard almost every night broadcasting from the Studio in Keene, N.H.
4. Ian would continue to be restricted to travel within New Hampshire only. If travel is requested for out of state reasons, he would need to get prior approval from U.S. Probation.

5. The requested modification is reasonable in light of Ian's non-violent nature and his track record of appearing in Court and reporting to Probation when required to report.
6. This office has contacted AUSA John Kennedy, and he indicated that the Government objects to this request.

WHEREFORE the defendant respectfully requests that this Honorable Court grant the following relief:

- A. Eliminate the "home confinement" aspect of his release; or
- B. In the alternative, schedule a hearing on this request; and
- C. For such further relief as may be just.

Respectfully Submitted,

Dated: May 2, 2023

/s/ Mark L. Sisti, Esq.
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CERTIFICATION

I hereby certify that on this 2nd day of May 2023 that a copy of the foregoing Motion to Modify Release Conditions has been forwarded to Seth Aframe, Esq., Georgiana MacDonald, Esq., and John Kennedy, Esq. of the U.S. District Attorney's Office, through the Court's electronic filing system.

/s/ Mark L. Sisti, Esq.
Mark L. Sisti, Esq.